



California Regional Water Quality Control Board

Los Angeles Region



Recipient of the 2001 *Environmental Leadership Award* from Keep California Beautiful

Linda S. Adams
Agency Secretary

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Arnold Schwarzenegger
Governor

October 31, 2007

Ms. Alice C. Clarno, EA, ATA
The Spirito Family Trust
1801 South Myrtle Avenue, Suite H,
Monrovia, California 91016-4800

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
7005-0390-0000-4141-1425

**REQUIREMENT FOR A TECHNICAL REPORT – REMEDIAL ACTION PLAN
PURSUANT TO CALIFORNIA WATER CODE SECTION 13267 – FORMER
EXCELLO PLATING COMPANY INC., 4057 GOODWIN AVENUE, LOS ANGELES,
CALIFORNIA (FILE NO. 113.5243, SITE ID NO. 2040209, CAO NO. R4-2003-0038-R)**

Dear Ms. Clarno:

We have received the *Remedial Action Plan*, dated August 27, 2007, prepared by your consultants, Conservation Consulting International, Inc. Regional Board staff has reviewed the Aug 27, 2007 *Remedial Action Plan* (RAP), and has determined that there are three significant elements that must be addressed or presented in the RAP for the former Excello Plating facility. Therefore, pursuant to Section 13267(b) of the California Water Code (CWC), you are hereby directed to submit the following changes or amendments:

1. Prepare and submit a Conceptual Site Model (CSM) which illustrates the source of contamination in soil, the pathway (of soil contamination to groundwater impact), and the receptors, such as City of Glendale groundwater supply well GS-3 which is adjacent to the site. This does not need be a separate report, however, at a minimum, it should be a detailed, cross-sectional diagram or block model that shows the above criteria. The utilization of a CSM will be required for this site regardless of what methodology or remediation technique is eventually adopted.
2. A proposed excavation for the purpose of remediation must include a representative lithologic cross-section through each area of concern. The cross-section must be to scale, portray the heavy metal contaminant areas and the contaminant concentrations in milligrams per kilogram (mg/kg); the cross-section must also indicate the limits of the proposed excavation and the occurrence of first groundwater. These required cross-sections may be integral or part of the comprehensive CSM diagram.
3. The United States Environmental Protection Agency (USEPA) Region 9 soil screening level, Dilution Attenuation Factor (DAF)-20 is not the appropriate soil screening level for this site due to the occurrence of shallow groundwater. Therefore, the proposed

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excavation limits should conform to the DAF-1 number for hexavalent chromium, as well as other applicable chemicals of concern that exceed soil screening levels DAF-1.

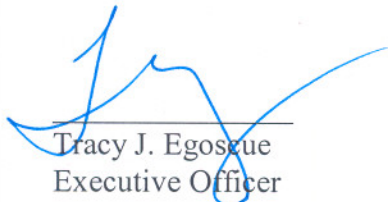
OTHER REQUIREMENT

All work must be performed in accordance to State Water Resources Control Board Resolution No. 92-49, under CWC Section 13304, which states that all fieldwork related to implementing the required workplan (technical report) such as soil borings, and/or well installation(s) must be conducted by, or under the direct responsible supervision of, a registered geologist or licensed civil engineer. All technical documents submitted to this Regional Board must be reviewed, signed and stamped by a California professional geologist, or a California professional civil engineer with at least five years hydrogeologic experience. Furthermore, the California Business and Professions Code Sections 6735, 7835, and 7835.1 require that engineering and geologic evaluations and judgments be performed by or under the direction of registered professionals.

Pursuant to Section 13268 of the CWC failure to submit the required technical report by the due date specified may result in the imposition of civil liability penalties by this Regional Board of up to \$5,000.00 per day for each day the report is not received. These civil liabilities can be assessed by the Regional Board any time after **December 10, 2007** and without further warning.

Should you have questions or wish to discuss details, please contact Mr. Dixon Oriola at (213) 576-6803, Mr. Larry Moore at (213) 576-6730.

Sincerely,



Tracy J. Egosue
Executive Officer

cc: Mr. Kurt Souza, Department of Health Services, Drinking Water Field Operations
Mr. David Stensby, US Environmental Protection Agency, Region IX
Mr. Bob Fitzgerald, US Environmental Protection Agency, Region IX
Mr. Mark Mackowski, Upper Los Angeles River Area (ULARA) Watermaster
Mr. Peter Kavounas, City of Glendale
Mr. Ed Nathan, 5430 Glendale LLC
Mr. Bill Mace, City of Burbank Water Supply Department
Ms. Patricia Bilgin, Los Angeles City Attorney Office
Mr. Vaughn Minassian, Los Angeles City Attorney Office
Mr. Mark Gilmartin, Law Offices of Mark Gilmartin

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Mr. Daniel Klier, Law Offices of Daniel Klier, Esq.
Mr. David Jonas, Conservation Consulting International
Ms. Sayareh Amirebrahimi, Department of Toxic Substances Control

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